

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

JANE DOE 1; JANE DOE 2; JANE DOE 3;
JANE DOE 4; and JANE DOE 5,

Plaintiffs,

v.

DARREN K. INDYKE AND RICHARD D. KAHN,
in their capacities as co-executors of THE ESTATE
OF JEFFREY E. EPSTEIN; ESTATE OF JEFFREY
E. EPSTEIN, and ROES 2-10

Defendants.

Case No. 1:19-cv-07675-GBD-DCF

**JOINT STIPULATION AND [PROPOSED] ORDER ON PLAINTIFFS' THIRD
AMENDED COMPLAINT AND MAINTAINING STAY OF ACTION**

WHEREAS independent claims administration experts have designed and are
implementing the Epstein Victims' Compensation Program (the "Program") to resolve sexual
abuse claims against decedent Jeffrey E. Epstein ("Decedent") in a non-adversarial alternative to
litigation; and

WHEREAS Plaintiffs Jane Doe 1, Jane Doe 2, Jane Doe 3, Jane Doe 4, and Jane Doe 5
(together, "Plaintiffs") seek to participate in the Program; and

WHEREAS Plaintiffs and Defendants Darren K. Indyke and Richard D. Kahn, Co-
Executors of the Estate of Jeffrey E. Epstein (the "Co-Executors", and together with Plaintiffs,
the "Parties") seek to preserve their resources and judicial economy by staying this action unless
and until Plaintiffs cease their participation in the Program;

WHEREAS, should Plaintiffs resolve their claims against Decedent via the Program, the
Parties will thereafter promptly discontinue this action with prejudice;

WHEREAS, on January 3, 2020, the Court entered a Joint Stipulation and Order (ECF Doc. 36) staying this action pending Plaintiffs' participation in the Program;

WHEREAS, on January 8, 2020, the Court entered an Order (ECF Doc. 38) granting the Co-Executors 30 days from after the lifting of the stay, if any, to answer, move or otherwise respond to Plaintiffs' First Amended Complaint;

WHEREAS, Plaintiffs now seek to amend their Second Amended Complaint by filing the proposed Third Amended Complaint attached hereto as Exhibit A, solely to add an additional plaintiff, Jane Doe 6, and allegations in support of Jane Doe 6's claims;

WHEREAS, Jane Doe 6 also seeks to participate in the Program and preserve her resources and judicial economy by staying this action unless and until she ceases such participation;

WHEREAS, the Co-Executors consent to Plaintiffs having leave to file their Third Amended Complaint attached hereto, provided, however, that: (i) this is without prejudice to the Co-Executors' rights and legal positions, including without limitation their response to the Third Amended Complaint; and

WHEREAS, the Co-Executors and Jane Doe 6 agree she shall be subject to the Court's prior Order on Plaintiff's Anonymity (ECF Doc. 31).

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned counsel for the Parties and prospective plaintiff Jane Doe 6, that:

1. Plaintiffs are granted leave to file their proposed Third Amended Complaint attached hereto, without prejudice to the Co-Executors' rights and legal positions, including without limitation their response to the Third Amended Complaint.
2. This action remains stayed pending further Order of the Court.

3. The Co-Executors have 30 days from after the lifting of the stay, if any, to answer, move or otherwise respond to Plaintiffs' Third Amended Complaint.

Dated: June 17, 2020
New York, New York

Respectfully submitted,

THE BLOOM FIRM

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*Attorneys for Defendants Darren K. Indyke and
Richard D. Kahn, Co-Executors of the Estate
of Jeffrey E. Epstein*

Date: _____
New York, New York

HON. DEBRA FREEMAN
United States Magistrate Judge